

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 19 DEC 1983

WIRE ROPE CORP

*file*

SUBJECT: Transmittal of Inspection Reports

FROM: Robert B. Dona *RBDona*  
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson  
Chief, AWCM/ARWM

This memorandum transmits the following RCRA inspection reports performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>I.D. Number</u>	<u>Activity Number</u>
Union Wire Rope Kansas City, Missouri	MOD001686740	AU72
Ramsey Corp. Sullivan, Missouri	MOD0934390416	AU69

Attachments



R00065078  
RCRA Records Center

**RECEIVED**

DEC 20 1983

AIR AND WASTE COMPLIANCE  
BRANCH

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

*Incomplete*

DATE: DEC 10 1983

SUBJECT: RCRA Regulatory Inspection Report

FROM: Robert B. Dona *RB Dona*  
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson  
Chief, AWCN/ARWM

An inspection of the facility listed below was performed August 22, 1983 to determine the status of a cleanup of a F001 waste (1,1,1-Trichloroethane). The inspection began at 11:00 a.m. and was concluded at 2:30 p.m.

*27-30, 1982 - see next page*

Facility Information

Union Wire Rope  
2100 Manchester Avenue  
Kansas City, Missouri 64126  
EPA I.D. Number: MOD001686740  
Activity Number: AU72

Inspection Participants

Union Wire Rope (Union):  
Larry R. Burchett, Assistant Plant Engineer, 816/242-5866  
Kenneth W. Ireland, Engineer Assistant, 816/242-5772  
Jerry K. Fuller, Wire Mill Superintendant, 816/242-5770

Missouri Department of Natural Resources (MDNR):  
Gene Holcomb, Environmental Engineer, Kansas City Regional Office

U.S. Environmental Protection Agency (EPA):  
Harry U. Gilmer, Chemical Engineer

Observations

The purpose of the inspection was to observe the progress and handling of a spill of F001 (1,1,1-Trichloroethane) near an underground storage area. The contaminated ground had been removed and replaced with clean gravel. The contaminated earth and gravel had been placed in 55 gallon steel drums and shipped to a licensed disposal facility.

At the present time approximately 100-150 gallons of F001 are produced each month. This is accumulated in 55 gallon steel drums. Mr. Burchett informed us that Union was in process of eliminating all hazardous wastes, e.g., F001, from the facility.

The method of producing wire rods, the Stelmor Process, had resulted in a great reduction of wire heat treating.



Copy

# REPORT OF RCRA COMPLIANCE INSPECTION

ARMCO, INCORPORATED

UNION WIRE ROPE DIVISION

KANSAS CITY, MISSOURI

EPA I.D. NO.: MOD001686740

AUGUST 30, 1982

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region VII  
Environmental Services Division

## INTRODUCTION

At the request of the Air and Waste Management Division, a compliance evaluation inspection of the ARMCO, Inc., Union Wire Rope Division was conducted August 27 and 30, 1982. This investigation was made to determine whether the Union Wire Rope facility is in compliance with the Interim Status Hazardous Waste regulations established under the Resource Conservation and Recovery Act of 1976, as amended. This narrative report, with attachments, presents the results of that inspection.

## PARTICIPATING PERSONNEL

Union Wire Rope: Jerry Fuller, Senior Civil Engineer

U.S. EPA: Vincent V. Smith, P.E., Environmental Engineer  
David Doyle, Environmental Engineer

## FACILITY DESCRIPTION

Union Wire Rope produces steel cable. Union Wire Rope receives the bar stock, draws it into wire, and twists many strands of wire into cable. Much of their product is used by the oil drilling industry. At the present time, production is down because the demand from the oil industry is down.

## DISCUSSION

Union Wire Rope had several areas that may be hazardous waste areas. They accumulated waste trichloroethane, and stored it in a large tank. Paint stripper sludge was stored on a loading dock. Pickle liquid was recycled in a recovery system. Other wastes, as a result of cleanup after recent flood, were stored in barrels.

Jerry Fuller said waste trichloroethane was produced at an average rate of 50 gallons per week. Waste trichloroethane is produced at a rate of about 20 to 30 gallons per week from their die cleaning operation and about 30 gallons from their wire rope operation. David Doyle and the author concluded that,



because of quantities, Union Wire Rope is a small quantity generator. Of special concern for this inspection was a report that waste trichloroethane may be discharging into a storm sewer. This was discussed with Larry Fuller. He said that this had happened. Someone made them aware of it, and they disconnected that pipe and connected a hose to the pipe. The hose now drains the waste trichloroethane into a 55-gallon barrel.

One barrel was being filled and an empty barrel, along with two barrels of new material, was on a pallet at this location. The waste trichloroethane from the die cleaning operation, on the second floor, now flows to a barrel on the first floor. The barrels, when filled, are taken to an outside 700-gallon holding tank and emptied into it. Jerry Fuller said past disposal was that the waste trichloroethane was taken to Midwestern Steel Division of ARMCO, Inc. He further stated Union Wire Rope is getting bids to dispose of it otherwise now.

When we observed the 700-gallon waste trichloroethane tank, the drain had been left open. Inside the tank there was a four-inch average depth of sludge. Under the drain of the tank was a pool of liquid (see photo). There was an area where it appeared that some waste may have flowed from the 700-gallon tank on the graveled earth and an open cooling water tank (see photos in appendix). The drain valve of the tank was closed by a workman at the request of Jerry Fuller.

Paint stripper sludge was stored in 18 barrels on a dock. This dock was on the railroad side of the main production building. All the barrels had covers on them. They were out of the weather under a roof overhang. Jerry Fuller said the barrels had been there since at least March. He further stated that they were working on getting the paint stripper sludge analyzed.

Union Wire Rope has an acid recovery system for their pickle liquid. We determined that this system is exempt from regulation because it is a closed process. The system does include two large tanks. The pickle liquid is used to clean rods before drawing into wire. In the acid recovery system, iron sulfate crystals are precipitated out. Iron sulfate crystals are sold on the market. The acid is cooled and reused.

Other solid wastes include 18 barrels of debris from the pits and other cleaning up after the recent flood. These barrels were outside and several did not have covers. To the author they appeared to contain dirt, plastic and wood (what one would expect in a flood).

#### FINDINGS AND CONCLUSIONS

See copies of documents obtained during inspection including Notice of Inspection and photos. The following comments parallel the Notice of Violation.

262.11 - A person who generates a solid waste as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste. Therefore, Union Wire Rope Division of ARMCO, Inc. must determine if paint waste is hazardous.

261.5.g.3 - Hazardous waste trichloroethane is not being disposed of in an approved off-site facility. The waste trichloroethane is being sent to ARMCO, Midwestern Steel Division.



EXIT INTERVIEW

After the facility tour, on August 27, 1981, David Doyle and the author decided they should think about the findings before preparing the Notice of Violation. The author explained the Freedom of Information Act and Confidentiality, and presented Jerry Fuller with the Confidentiality Notice. Jerry Fuller advised us that he would seek the advice of corporate headquarters on his authority to sign the Confidentiality Notice. In a telephone conversation on August 31, 1981, Jerry Fuller advised the author that corporate headquarters had given him the authority to sign the Confidentiality Notice. He also advised the author that he signed the notice and mailed it.

On August 30, 1982, about 4:30 p.m., Vincent Smith met with Jerry Fuller. We went to the area where the 700-gallon trichloroethane tank was located. The area had been cleaned up and fresh gravel had been spread. There now was two 700-gallon tanks at this site. A steel plate had been placed over the unused concrete cooling water tanks. At this time the property perimeter gate was closed and locked. After thinking about the tank location and looking at the photo, the author believes the tanks were not 50 feet from their property line.

The Notice of Violation was given to Jerry Fuller before viewing the 700-gallon waste trichloroethane tanks, and the items were explained to him. He said he understood them and that Union Wire Rope was already working on both problems. He then signed the Notice of Violation.

Vincent V. Smith  
 Vincent V. Smith, P.E.  
 Environmental Engineer  
 Date:

9-2-82

Robert B. Dona  
 Robert B. Dona  
 Chief, Water Section  
 Date: Sept 3, 1982

Attachments:

Notice of Violation  
 Notice of Confidentiality  
 Photographs



USE EXISTING ONLY

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS

1. General Information:

(A) Facility Name: ARMCO Inc  
Union Wire Rope Division  
(B) Street: 2100 Manchester 64052  
(C) City: Kansas City (D) State: Mo (E) Zip Code: 64052  
(F) Phone: 816-242-5770 (G) County: Jackson  
(H) Operator: Small Quantity Generator  
(I) Street: \_\_\_\_\_  
(J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_  
(M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_  
(O) Owner: \_\_\_\_\_  
(P) Street: \_\_\_\_\_  
(Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_  
(T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_  
\_\_\_\_\_ Federal \_\_\_\_\_ Municipal ☒ Private  
(V) Type of Ownership: \_\_\_\_\_ State \_\_\_\_\_ County  
(W) Date of Inspection: 8-27-82 (Q) Time of Inspection (From) 8:30 (To) \_\_\_\_\_  
(X) Weather Conditions: fair



(Z) Inspection Participants

Title

Telephone

II. Description of Site Activity

(A) ☒ Generator (Form 2)

(B) ☐ Transporter (Form 3)

(C) ☐ Chemical, Physical  
and Biological Treatment (Form 4)

(D) ☐ Storage (Form 5)

(E) ☐ Landfill (Form 6)

(F) ☐ Incineration (Form 7)

(G) ☐ Land Treatment (Form 4)

(H) ☐ Thermal Treatment (Form 7)

(I) Comments:

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

(J) Has this facility  
Submitted a Part A  
Permit Application?

Yes

No

Not  
Inspected

See Remark  
Number



Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.?

☒ Yes ☐ Noa. If yes, EPA I.D. No. MOD 001686740262.21 Section B - Manifest

1. Does generator ship waste off-site?

☒ Yes ☐ No

a. If no, do not fill out Sections B and D.

*Did ship to Amco Inc.*

b. If yes, identify primary off-site facility(s) Use narrative explanations sheet.)

*Midwestern Steel Div*

2. Does generator use Manifest?

☐ Yes ☒ No

a. If no, is generator a small quantity generator?

☒ Yes ☐ No

1. If yes, does generator indicate this when sending waste to a T/S/D facility

☐ Yes ☒ No

b. If yes, does manifest include the following information?

*N/A*

1. Manifest Document No.

☐ Yes ☐ No

2. Generators Name, Mailing Address, Telephone No.

☐ Yes ☐ No

3. Generator EPA I.D. No.

☐ Yes ☐ No

4. Transporter(s) Name and EPA I.D. No.

☐ Yes ☐ No

5. a. Facility Name, Address and EPA I.D. No.

☐ Yes ☐ No

b. Alternate Facility Name, Address and EPA ID NO.

☐ Yes ☐ No

c. Instructions to return to generator if undeliverable?

☐ Yes ☐ No

6. Waste information required by DOT - Shipping name, quantity, (weight, or vol.) containers (type and number.)

☐ Yes ☐ No

7. Emergency Information (optional)

(special handling instructions, phone no.)

☐ Yes ☐ No



Yes No

262.40

Yes ☒ No ☐

262.23

- a. (1) Did generator sign and date all manifests? Yes No  
(2) Who signed for generator? Name Title
- b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? Yes No  
(2) Who signed and dated for transporter? Name Title
- c. Does generator retain one copy of manifest signed by generator and transporter? Yes No
- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? Yes No
- e. Does generator retain copies for 3 years? Yes No

262. ~~11~~

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? Yes No

- ~~262-11~~<sup>2</sup>. a. If yes, list wastes and quantities (include EPA Hazardous Waste No.)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) Yes No

- a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) \_\_\_\_\_

- b. Does generator determine characteristics by testing or by applying knowledge of processes?

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? Yes      No

- a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? ☐ Yes ☐ No
- a. If yes, did generator test all wastes to determine non-hazardous characteristics? ☐ Yes ☐ No
1. If no, list wastes and quantities deemed non-hazardous or processes from which non-hazardous waste was produced?  
(Use additional sheet if necessary.)
- 
- 
- 

Section D - Pre-Transport Requirements

2. 30 1. Does Generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) ☐ Yes ☐ No
- ~~262.32~~ 2. a. Are containers to be shipped leaking or corroding? ☐ Yes ☐ No  
b. Use sheet to describe containers and condition.  
c. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☐ No
- 262.32 3. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? ☐ Yes ☐ No
4. Does the generator mark each package in accordance with 49 CFR 172? ☐ Yes ☐ No
5. Is each container of 110 gallons or less marked with the following label? ☐ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address \_\_\_\_\_

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Manifest Document Number \_\_\_\_\_

- 262.33 6. Does generator have placards to offer to transporters? ☐ Yes ☐ No
- 262.34 7. Accumulation Time
- a. Are containers used to temporarily store waste before transport? ☐ Yes ☒ No



262.34

1. If y... is each container clearly da ?  
Also, fill out rest of No. 7 (Accum. inc)

Yes ☒ No

65.174 7. b.

1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections)

Yes ☒ No

2. If yes, with what frequency? (Weekly)

3. Records - log

Y ☒ N

5.176 7. c.

- Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line?

Yes ☐ No

(265.176 - Special Requirements for Ignitable or Reactive wastes)

62.34

NOTE: If tanks used, fill out checklist for tanks. ALL Subpart J applies (265.190)

7. d. Are the containers labeled and marked in accordance

with Section B 3, 4 & 5 of this form with the words "Hazardous Waste"

Yes ☒ No

NOTE: If generator accumulates waste on-site, fill out checklist

for General Facilities, Section B - Preparedness and Prevention,

Section C - Contingency Plan and Emergency Procedures.

7. e Are incompatible wastes stored together, or in same cont. ? -Y-N

7. f. Does generator comply with requirements for personnel training?

( Attach checklist for 265.16 - Personnel Training) Yes ☐ No

8. Describe storage area. Use photos and narrative explanation sheet.  
accumulation

262.40

#### Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

~~a. Manifests and signed copies from designated facilities?~~

Yes ☐ No

~~b. Annual Reports~~

Yes ☐ No

c. Exception Reports

Yes ☐ No

d. Test results

Yes ☐ No

2. Where are records kept (at facility or elsewhere)?

3. Who is in charge of keeping the records? Name \_\_\_\_\_ Title \_\_\_\_\_

#### Section F - Special Conditions

262.50

1. Has generator received from or transported to a foreign source any hazardous waste?

Yes ☐ No

a. If yes, has he filed a notice with the Regional Administrator?

Yes ☐ No

b. Is this waste manifested and signed by Foreign consignee?

Yes ☐ No

c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?

Yes ☐ No

What does accumulate mean? - does not go direct to waste system, is not a totally enclosed tank facility

265.15 (d) 6. Does the owner/operator maintain an inspection log? ☐ Yes ☐ No

A. If yes, does it include:

(1) Date and time of inspection? ☐ Yes ☐ No

(2) Name of inspector? ☐ Yes ☐ No

(3) Notation of observations? ☐ Yes ☐ No

(4) Date and nature of repairs or remedial action? ☐ Yes ☐ No

B. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet). ☐ Yes ☐ No

265.16

(262.34)

Personnel Training

7. Does the owner/operator maintain Personnel Training Records at the facility? ☐ Yes ☐ No  
How long are they kept? \_\_\_\_\_

A. If yes, do they include:

(1) Job title and written job description of each position? ☐ Yes ☐ No

(2) Description of type and amount of training? ☐ Yes ☐ No

(3) Records of training given to facility personnel? ☐ Yes ☐ No

265.17

(262.34)

Requirements for Ignitable, Reactive or Incompatible Waste

(a) 8. Does facility handle ignitable or reactive wastes? ☐ Yes ☐ No

A. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? ☐ Yes ☐ No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures.

2. If no, use narrative explanation sheet to describe sources of ignition or reaction.



desi ted locations? ☐ Yes ☐ No

C. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No

(b) 9. Check containers

A. Are containers leaking or corroding? ☐ Yes ☐ No

B. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☐ No  
(Use narrative explanations sheet to describe condition of containers.)

265.31 Section B - Preparedness and Prevention If ignitable or acutely toxic  
(262.34)

1. Is there evidence of fire, explosion or contamination of the environment? ☐ Yes ☐ No

If yes, use narrative explanations sheet to explain.

265.32 2. Is the facility equipped with

A. Internal communication or alarm system? ☐ Yes ☐ No

(1) Is it easily accessible in case of emergency? ☐ Yes ☐ No

B. Telephone or two-way radio to call emergency response personnel? ☐ Yes ☐ No

C. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment? ☐ Yes ☐ No

265.33 (1) Is this equipment tested to assure its proper operation? ☐ Yes ☐ No

D. Water of adequate volume for hoses, sprinklers or water spray system? ☐ Yes ☐ No

(1) Describe source of water \_\_\_\_\_

- 265.35 3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ☐ Yes ☐ No
- 265.37 4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ☐ Yes ☐ No
- 265.50 5. In the case that more than one police and fire department might respond, is there a designated primary authority? ☐ Yes ☐ No  
a. If yes, list primary authority \_\_\_\_\_
- 265.52 (a) 6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? ☐ Yes ☐ No  
Are they readily available to all personnel? ☐ Yes ☐ No
- (c) 7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ☐ Yes ☐ No
8. If State or local authorities decline to enter, is this entered in the operating record? ☐ Yes ☐ No

265.52 Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ☐ Yes ☐ No  
Get a copy  
a. If yes, does it include PD, FD, MC & EPA IS  
is it a revised SPEC plan? ☐ Yes ☐ No  
b. Has it been sent to ☐ Y ☐ N
2. Is there an emergency coordinator on site at all times? ☐ Yes ☐ No

Section D - Manifest System, Recordkeeping and Reporting

- 265.71 1. Does facility receive waste from off-site? ☐ Yes ☐ No
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No



Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: ARMCO INC. UNION WIRE ROPE DIVISION  
Address: 2100 MANCHESTER  
KANSAS CITY, MO 64125  
EPA ID No: MOD 001686740  
DATE: 8-30-82

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

CFR/State Reg./Statutory Cite	Description of Violation
<u>262.11</u>	<u>MUST DETERMINE IF THE PAINT WASTE IS HAZARDOUS.</u>
<u>261.59.3</u>	<u>HAZARDOUS WASTE TRICHLOROETHANE IS NOT BEING DISPOSED OF IN AN APPROVED OFFSITE FACILITY.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and is not intended to be a complete listing of all violations which may be identified as a result of this inspection.

The UNION WIRE ROPE DIV. is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106. The corrective actions taken by UNION WIRE ROPE DIV. will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call DAVID DOYLE at 816/374-7133

This Notice prepared by VINCENT V. SMITH Date 8-30-82

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:  
Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: Jerry K. Fuller Date: 8-30-82  
Signature: Jerry K. Fuller  
Title: Sr. Civil Engineer

**U.S. ENVIRONMENTAL PROTECTION AGENCY**

**RCRA INSPECTION  
CONFIDENTIALITY NOTICE**

Name and Address of Inspector(s) VINCENT V. SMITH U.S. EPA 25 FUNSTON RD. KANSAS CITY, KS. 66115  DAVID DOYLE U.S. EPA 324 EAST ELEVENTH ST. KANSAS CITY, MO. 64106	Name and Address of Facility UNION WIRE ROPE 2100 MANCHESTER KANSAS CITY, MO. 64125	
Name of Individual to Whom Notice Given	Owner, Operator, or Agent in Charge  Title  Address  Title  Date	

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.



If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

The statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner  
Director, Air and Waste Management Division  
United States Environmental Protection Agency  
324 E. 11th Street  
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

---

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name \_\_\_\_\_

Title \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name \_\_\_\_\_

Title \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_

U. S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address VINCENT V. SMITH U.S. EPA 25 FUNSTON RD. KANSAS CITY, KS. 66115  DAVIDA DOYLE U.S. EPA 324 E 118th. ST. KANSAS CITY		Firm Name and Address UNION WIRE ROPE - ARMCO 2100 MANCHESTER KANSAS CITY, MO. 64125 Name of Individual  Title	
Date Collected	Samples were: <input type="checkbox"/> Purchased <input type="checkbox"/> Received no charge <input type="checkbox"/> Borrowed		
Sample Numbers		Amount Paid for Samples	
Duplicate Samples Requested  <input type="checkbox"/> Yes <input type="checkbox"/> No		Method of Payment  <input type="checkbox"/> Cash <input type="checkbox"/> Voucher <input type="checkbox"/> To be Billed	

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document (s) and/or Sample(s) described below is hereby acknowledged:

Signature (Owner, Operator, or Agent)		Title
Name of Inspector	Title	Inspector's Signature

U.S. ENVIRONMENTAL PROTECTION AGENCY  
324 EAST 11TH STREET  
KANSAS CITY, MISSOURI 64106

REQUEST FOR CONFIDENTIAL  
TREATMENT

Name of Individual	Title	Date
Firm Name	Firm Address	

Information for which Confidential Treatment is requested:

Acknowledgement by Claimant

The undersigned requests that confidential-treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40FR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)		Title
Name of Inspector	Title	Inspector's Signature



## U.S. ENVIRONMENTAL PROTECTION AGENCY

RCRA INSPECTION  
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) VINCENT V. SMITH 25 FUNSTON RD KANSAS CITY, KS. 66115  DAVID DOYLE 324 E 11TH ST. KANSAS CITY, MO. 64103	Name and Address of Facility ARMO INC UNION WIRE ROPE DIV KANSAS CITY, MO.	
	Owner, Operator, or Agent in Charge	
	Title	
Name of Individual to Whom Notice Given JERRY FULLER	Address	
	Title SENIOR CIVIL ENGINEER	Date 8/27/82

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

The statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner  
Director, Air and Waste Management Division  
United States Environmental Protection Agency  
324 E. 11th Street  
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name Jerry K. Fuller

Title Sr. Civil Engineer

Signature Jerry K. Fuller

Date 8-27-82

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name \_\_\_\_\_

Title \_\_\_\_\_

Address \_\_\_\_\_

U. S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address VINCENT V. SMITH 25 FUNSTON RD. KANSAS CITY, KS 66115 DAVID DOYLE 324 E 11th ST. KANSAS CITY MO 64106		Firm Name and Address ARMO INC UNION WIRE ROPE DIV 2100 MANHESSE KANSAS CITY, MO 64125 Name of Individual JERRY FULLER Title	
Date Collected 8/27/82	Samples were: <input type="checkbox"/> Purchased <input checked="" type="checkbox"/> Received no charge <input type="checkbox"/> Borrowed		
Sample Numbers		Amount Paid for Samples	
Duplicate Samples Requested <input type="checkbox"/> Yes <input type="checkbox"/> No		Method of Payment <input type="checkbox"/> Cash <input type="checkbox"/> Voucher <input type="checkbox"/> To be Billed	

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document (s) and/or Sample(s) described below is hereby acknowledged:

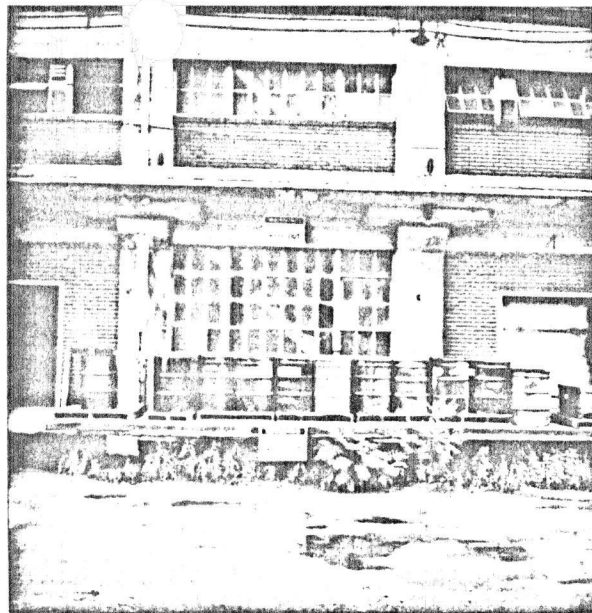
(6) Photos of hazardous waste storage areas.

Signature (Owner, Operator, or Agent) <i>Jerry K. Fuller</i>		Title Sr. Civil Engineer
Name of Inspector VINCENT V. SMITH	Title ENVR ENGR	Inspector's Signature <i>Vincent V. Smith</i>

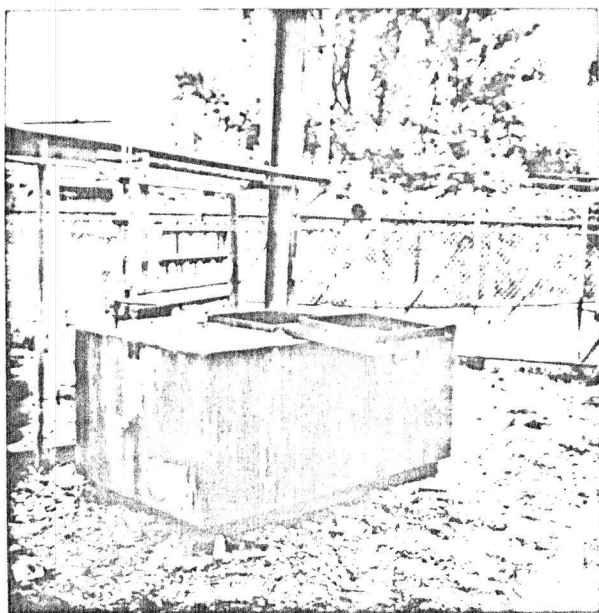




Two barrels of waste trichloroethane on left. Two barrels of new material on right.



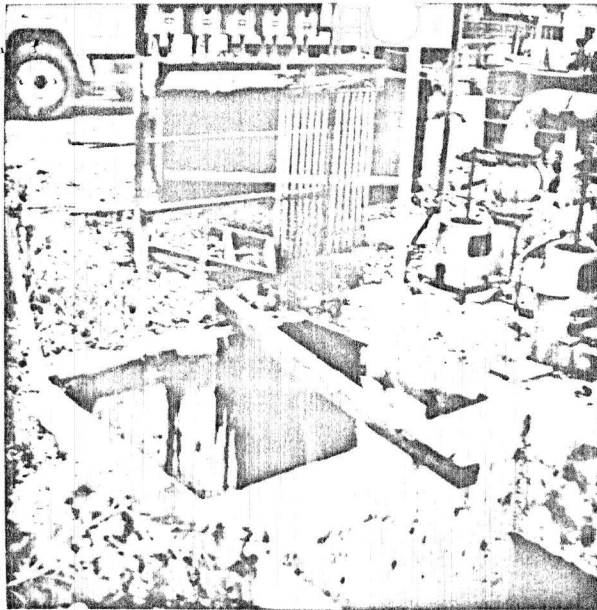
Waste paint.



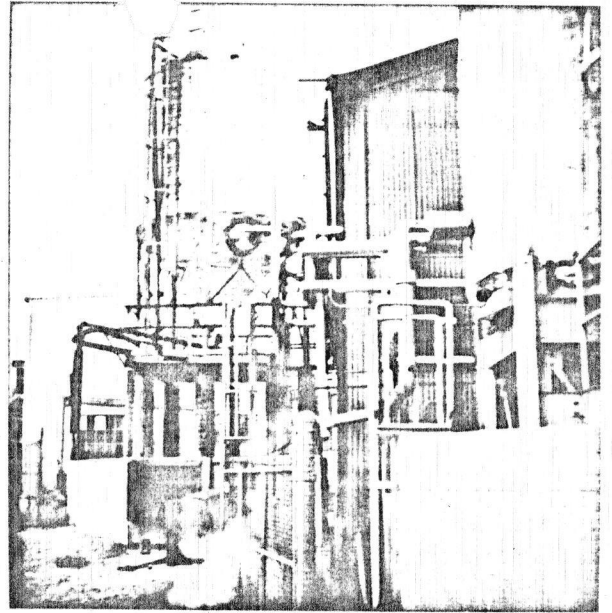
700-gallon waste trichloroethane tank.



700-gallon waste trichloroethane tank with pool of liquid under drain.



700-gallon waste trichloroethane tank  
flow from drain shown.



Recovery system for acid.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: DEC 1 1983

SUBJECT: RCRA Regulatory Inspection Report

FROM: Robert B. Dona *RB Dona*  
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson  
Chief, AWCM/ARWM

An inspection of the facility listed below was performed August 22, 1983 to determine the status of a cleanup of a F001 waste (1,1,1-Trichloroethane). The inspection began at 11:00 a.m. and was concluded at 2:30 p.m.

Facility Information

Union Wire Rope  
2100 Manchester Avenue  
Kansas City, Missouri 64126  
EPA I.D. Number: MOD001686740  
Activity Number: AU72

Inspection Participants

Union Wire Rope (Union):  
Larry R. Burchett, Assistant Plan Engineer, 816/242-5866  
Kenneth W. Ireland, Engineer Assistant, 816/242/-5772  
Jerry K. Fuller, Wire Mill Superintendant, 816/242-5770

Missouri Department of Natural Resources (MDNR):  
Gene Holcomb, Environmental Engineer, Kansas City Regional Office

U.S. Environmental Protection Agency (EPA):  
Harry U. Gilmer, Chemical Engineer

Observations

The purpose of the inspection was to observe the progress and handling of a spill of F001 (1,1,1-Trichloroethane) near an underground storage area. The contaminated ground had been removed and replaced with clean gravel. The contaminated earth and gravel had been placed in 55 gallon steel drums and shipped to a licensed disposal facility.

At the present time approximately 100-150 gallons of F001 are produced each month. This is accumulated in 55 gallon steel drums. Mr. Burchett informed us that Union was in process of eliminating all hazardous wastes, e.g., F001, from the facility.

The method of producing wire rods, the Stelmor Process, had resulted in a great reduction of wire heat treating.